

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE APPLICATION)	
OF DELMARVA POWER & LIGHT COMPANY,)	
EXELON CORORPATION, PEPCO HOLDINGS)	PSC DOCKET NO. 14-193
INC., PURPLE ACQUISITION CORPORATION,)	
EXELON ENERGY DELIVERY COMPANY, LLC)	
AND SPECIAL PURPOSE ENTITY, LLC)	
FOR APPROVALS UNDER THE PROVISIONS)	
OF 26 <i>Del. C.</i> §§ 215 AND 1016)	
(FILED JUNE 18, 2014))	

JEREMY FIRESTONE’S PROPOSED ALLOCATION OF MFN BENEFITS

August 12, 2016

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Pro Se

In accordance with paragraph 3 of the Amended Scheduling Order, and the Amended Settlement Agreement, I, Jeremy Firestone, propose that the Commission adopt an allocation of the additional Most Favored Nation (MFN) benefits as follows.

1. Proposed allocation of additional financial benefits (\$27.1 million)¹.
 - a. \$10.0 million to the Delaware Department of Natural Resources and Environmental Control (DNREC) for two (2) specific energy efficiency programs.
 - i. \$2.0 million additional funds for the low-income customer energy-efficiency program, increasing the total program funding to \$4.0 million for Delmarva Power customers only.

¹ Plus any interest on the 27.1 million and on each item listed.

- ii. \$8.0 million to fund the commercial and industrial Energy-Efficiency Investment Fund (“EEIF”) to re-establish programs for Delmarva Power customers only. This amount will allow the program to be funded for approximately two years.
- b. \$3.1 million for expanded residential customer arrearage forgiveness to be used in a jointly developed arrearage management plan for Delmarva Power gas and electric residential customers.
- c. \$4.0 million for research on solar and wind power that would provide a benefit to Delaware. In order to minimize administrative costs, it is suggested that request for proposals (RFP) be administered by the University of Delaware. The Principle Investigator (PI) on project proposals would be limited to the University of Delaware, Delaware State or Delaware Tech, with indirect/overhead costs shall limited to 38 percent, and awardees required to provide match of 20 percent. No award shall exceed \$500,000 (exclusive of the 20 percent).
- d. \$1.0 million to expand electric vehicle charging stations within the State. This program will be modeled on the initial program established by DNREC in cooperation with the University of Delaware in order to minimize design and overhead costs. This would provide for charging stations plus five years of free charging.
- e. \$9.0 million in lump sum rebates to low income Delmarva Power residential customers gas and electric customers on a proportional basis.
 - i. \$6.5 million to those in the lowest Delaware household income quintile

- ii. \$2.5 million to those in second lowest Delaware household income quintile,

2. Other additional benefits – non-financial or outside of \$27.1 million allocation amount.

- Exelon shall provide \$3.0 million of capital to creditworthy governmental entities at market rates for the development of renewable energy projects in the Delaware.
- Exelon shall develop or assist in the development of five (5) MW of renewable power generation in the State of Delaware. Renewable power may be generated by any eligible energy resource as defined under 26 Del. C. § 352(6). No rate recovery for development.
- Delmarva Power will provide assistance and support for a microgrid pilot project. Delmarva Power will file with the Commission a proposal for one pilot public-purpose microgrid project to provide enhanced energy services to the selected areas, including during emergency events. The filing will include a proposal for funding Delmarva Power's costs in connection with the projects through Delmarva Power's regulated rates and a description of any federal, state, or local contribution to the development of the microgrid project. The proposal of the microgrid project will include: planning, design, and construction of physical facilities and control technologies, the development of onsite distributed-generation sources, such as combined heat and power, solar photovoltaic, and fuel cells, and operation and maintenance activities. The development and implementation of the microgrid shall be competitively-sourced.
- The Joint Applicants will extend the utility job related commitment of paragraph 3 of the Amended Settlement Agreement from two years to five years. The new

commitment will be that Exelon shall not permit a net reduction, due to involuntary attrition as a result of the Merger integration process, in the employment levels at Delmarva Power's utility operations in the Delaware for five (5) years after the Merger closes.

- Any other commitments made by Exelon to either PSC Staff or to the Delaware Public Advocate.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeremy Firestone". The signature is fluid and cursive, with the first name "Jeremy" and last name "Firestone" clearly distinguishable.

Jeremy Firestone
August 12, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2016, that on behalf of Jeremy Firestone, *Pro Se*, I filed Jeremy Firestone's Proposed Allocation of MFN Benefits with Delafile and served a copy of the same on all persons on the email service list by email attachment.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeremy Firestone". The signature is stylized with a large, looping initial "J" and a cursive "Firestone".

Jeremy Firestone
12 August 2016